

# Exhibit 7

# **EXHIBIT 45**

1 UNITED STATES DISTRICT COURT  
2 NORTHERN DISTRICT OF CALIFORNIA  
3 SAN JOSE DIVISION  
4

5 APPLE INC., a California  
6 corporation,

7 Plaintiff,

8 vs.

CASE NO. 11 cv 01846 LHK

9 SAMSUNG ELECTRONICS CO.,  
10 LTD., a Korean business  
11 entity; SAMSUNG ELECTRONICS  
12 AMERICA, INC., a New York  
13 corporation; SAMSUNG  
14 TELECOMMUNICATIONS AMERICA,  
15 LLC, a Delaware limited  
16 liability company,  
17 Defendants.

18 \_\_\_\_\_/  
19 H I G H L Y C O N F I D E N T I A L  
20 A T T O R N E Y S ' E Y E S O N L Y

21 VIDEOTAPED DEPOSITION OF DOUGLAS SATZGER  
22 REDWOOD SHORES, CALIFORNIA  
23 TUESDAY, NOVEMBER 8, 2011

24 BY: ANDREA M. IGNACIO HOWARD, CSR, RPR, CCRR, CLR  
25 CSR LICENSE NO. 9830  
JOB NO. 42999

1 archive storage space.

2 Q So when the move occurred, some of the files  
3 were just sent directly to an archive?

4 A Storage.

5 Q As opposed to being moved to the new  
6 offices --

7 MR. DAVIS: Foundation.

8 MR. ZELLER: Q. -- as you understood it?

9 A I -- I don't know where they were moved,  
10 actually. I'm not sure if they -- we had -- we had  
11 off-site, we had in-office, and we had on-campus  
12 storage. I don't recall.

13 Q Did you ever see an index or -- or a database  
14 or other list of files that you had that were in  
15 archive?

16 A No.

17 Q If you wanted to find out, back in the time  
18 period when you were working at Apple, whether or not  
19 any of your files were in archive, is there somebody  
20 you would ask?

21 A No.

22 Q Do you recall the last time that you saw any  
23 of the loose page sketches you did?

24 A My recollection is when we were on Valley  
25 Green.

1 Q And those were the old offices before --

2 A Old office, yeah.

3 MR. DAVIS: You stepped over him a little  
4 bit.

5 THE WITNESS: Oh, yeah.

6 MR. DAVIS: Just make sure you let him finish  
7 his question, but you're fine.

8 MR. ZELLER: Directing your attention back to  
9 Exhibit 1172.

10 Q Among these pages, did you see any pages that  
11 relate to any tablet computer design?

12 A No.

13 Q I take it at some point you -- you do recall  
14 doing some sketches or drawings of tablet computer  
15 designs or potential tablet computer designs when you  
16 were at Apple?

17 A I -- yes.

18 Q Do you have any idea where those are?

19 A I do not.

20 Q I'm going to show you what was previously  
21 marked as Exhibit 8, which is a copy of United States  
22 Design Patent 504,889. And please let me know when  
23 you've had a chance to look at the '889 design patent.

24 A Pardon me.

25 Q Do you recognize the '889 design patent as a

1 patent you're a named inventor on?

2 A Yes.

3 Q Focusing on the design that's shown here in  
4 the '889 design patent, did you create sketches of --  
5 of this design?

6 A Yes.

7 Q And I take it you didn't see any of those  
8 sketches here in 1172?

9 A No.

10 Q Do you have any -- any idea or knowledge or  
11 information as to where any of the sketches that you  
12 prepared in connection with the '889 design patent  
13 design are?

14 A No.

15 Q Do you have any idea where they were as of  
16 the time you left Apple in 2008?

17 A No.

18 Q Do you have any knowledge or information --  
19 well, let me try it this way: If -- if -- as of the  
20 time in 2008 when you left Apple, is there any place  
21 you can think of you would go and ask and look?

22 A Yes.

23 Q What -- what did you have in mind for that?

24 A I would search the in-office storage for any  
25 of my file boxes, and then the other on-campus storage

[REDACTED]

11 MR. HUNG: Objection; vague.

12 THE WITNESS: Yes.

13 MR. ZELLER: All right.

14 Do you have the 035 mockup?

15 MR. HUNG: No.

16 MR. ZELLER: Okay.

17 MR. HUNG: I didn't actually -- we didn't  
18 receive an e-mail, I think, asking us to bring it to  
19 this depo.

20 MR. ZELLER: We've asked for it to be  
21 available for all of the interim depositions.

22 Do you have these?

23 MR. HALL: Yes.

24 Would you please mark as Exhibit 1173 a  
25 multipage document consisting of photographs of the --

1 what people call the 035 mockup.

2 (Document marked Exhibit 1173

3 for identification.)

4 MR. ZELLER: All right.

5 Q And so you know, what we've marked as  
6 Exhibit 1173 are photographs of a mockup -- an Apple  
7 mockup that has generally been identified as the 035  
8 mockup.

9 A Uh-huh, yes.

[REDACTED]

23 MR. HUNG: Objection; calls for a legal  
24 conclusion; foundation.

25 MR. DAVIS: Calls for speculation.



[REDACTED]

[REDACTED]

[REDACTED]